

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: CASE NO. 17-00117

Paris Nicole Winston; CHAPTER 13

Debtor(s). JUDGE Deborah L. Thorne

OBJECTION TO CONFIRMATION OF PLAN FILED JANUARY 13, 2017

Wells Fargo Bank, NA, hereinafter referred to as "Creditor", by and through its attorneys, ANSELMO LINDBERG OLIVER LLC, objects to the confirmation of the Chapter 13 plan for the following reasons:

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and the general orders of the Northern District of Illinois.
2. Venue is fixed in this Court pursuant to 28 U.S.C. § 1409.
3. This matter constitutes a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(L).
4. The debtor filed a petition for relief under Chapter 13 on January 3, 2017.
5. Wells Fargo Bank, NA (hereinafter referred to as "Creditor") holds a mortgage secured by a lien on debtor's real estate commonly known as 15104 Woodlawn Avenue, Dolton, Illinois 60419.
6. Creditor filed a claim for pre-petition arrears in the amount of \$33,618.98 and a total secured claim in the amount of \$112,170.17. (See Proof of Claim 4-1 filed January 30, 2017.)
7. The debtor's plan proposes to "cramdown" the value of the property located at 15104 Woodlawn Avenue, Dolton, Illinois 60419.

8. Section E (3.1) of the debtor's plan states that the collateral held by the Movant has a value of \$83,500.00 and proposes to pay that amount at 4.25% interest over the life of the plan.
9. Creditor's appraiser has been attempting to access the subject property to complete a full interior appraisal. However, Debtor's tenant in the garden unit has been unresponsive. Further, Creditor has not received any status update regarding the Debtor obtaining access to the unit after reasonable notice to her tenant, per the Illinois Landlord and Tenant Act.
10. Creditor is unable to complete an interior inspection of the entire subject property and thereby complete its appraisal. Creditor objects to confirmation of the plan until its appraisal is completed and the value of the property can be determined.

WHEREFORE, Creditor prays for an entry of the attached Order Denying Confirmation of the Chapter 13 plan.

Wells Fargo Bank, NA

/s/ Crystal V. Sava

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